

**IN THE UNITED STATE DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Alexis Rios,
Plaintiff,

v.

AFNI, Inc.
Defendant.

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Case No.

DEFENDANT AFNI, INC.'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant AFNI, Inc. (“AFNI”) hereby removes the subject action from the Court of Common Pleas of Bucks County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania, on the following grounds:

1. Plaintiff Alexis Rios (“Plaintiff”) instituted an action in the Court of Common Pleas of Bucks County, Pennsylvania, on June 29, 2021.
2. AFNI was served on July 21, 2021. Therefore, removal is timely as this removal is filed within thirty (30) days of notice of the suit.
3. Plaintiff’s Complaint alleges violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. (“FDCPA”).
4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. §1331 because there is a federal question – an alleged violation of the FDCPA.
5. Pursuant to 28 U.S.C. §1441, *et seq.*, this cause may be removed from Court of Common Pleas of Bucks County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania.
6. Notice of this removal will promptly be filed with the clerk of Court of Common Pleas of Bucks County, Pennsylvania and be served on all adverse parties.

7. Pursuant to 28 U.S.C. §1446(a), copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendant are attached hereto and marked as composite **Exhibit A** and incorporated herein by reference

8. A jury demand was made in state court.

WHEREFORE, Defendant AFNI, Inc. respectfully requests that the aforementioned action, now pending in the Court of Common Pleas of Bucks County, Pennsylvania, be removed to the United States District Court for the Eastern District of Pennsylvania.

Respectfully Submitted,

Date: August 10, 2021

/s/ Justin M. Tuskan
Justin M. Tuskan (PA ID 311235)
Counsel for Defendant AFNI, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been forwarded via Email and/or the Court's Electronic Filing System, on this 10th day of August, 2021, to all counsel of record.

Respectfully Submitted,

Date: August 10, 2021

/s/ Justin M. Tuskan

Justin M. Tuskan (PA ID 311235)

Counsel for Defendant AFNI, Inc.

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